

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION and
THE PEOPLE OF THE STATE OF NEW
YORK, by LETITIA JAMES, Attorney
General of the State of New York,

Plaintiffs,

v.

QUINCY BIOSCIENCE HOLDING
COMPANY, INC., a corporation;

QUINCY BIOSCIENCE, LLC, a limited
liability company;

PREVAGEN, INC., a corporation
d/b/a/ SUGAR RIVER SUPPLEMENTS;

QUINCY BIOSCIENCE
MANUFACTURING, LLC, a limited
liability company; and

MARK UNDERWOOD, individually and as
an officer of QUINCY BIOSCIENCE
HOLDING COMPANY, INC., QUINCY
BIOSCIENCE, LLC, and PREVAGEN,
INC.,

Defendants.

Case No. 1:17-cv-00124-LLS

**DECLARATION OF ANNETTE
SOBERATS IN SUPPORT OF
PLAINTIFFS' LETTER OPPOSING
DEFENDANTS' MOTION FOR
LOCAL RULE 37.2 CONFERENCE
TO COMPEL SUPPLEMENTAL
DISCOVERY RESPONSES**

DECLARATION OF ANNETTE SOBERATS

I, Annette Soberats, hereby state that I am an attorney for the Federal Trade Commission in the above-captioned litigation against Corporate Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen, Inc., and Quincy Bioscience Manufacturing, LLC, and Individual Defendant Mark Underwood (collectively, "Defendants"). I submit this declaration in support of Plaintiffs' letter opposing Defendants' request for a Local Rule 37.2 Conference to compel Plaintiffs to produce supplemental written discovery responses. (Dkt. No. 143).

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' Responses and Objections to Corporate Defendants' Second Set of Interrogatories, dated September 14, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Date: November 23, 2020

/s/ Annette Soberats
Annette Soberats

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of November, 2020, I have served the foregoing by electronic filing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Annette Soberats
Annette Soberats